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11 TRADER JOE'S COMPANY

12
13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION – LOS ANGELES**

16 TRADER JOE'S COMPANY, a
17 California corporation,

18 Plaintiff,

19 v.

20 T-SHIRT AT FASHION LLC, entity
21 of unknown jurisdiction, and DOES
22 1-5,

23 Defendant.

Case No. 2:23-cv-03010-MWF-RAO

**DECLARATION OF TAYLOR
LASTOR IN SUPPORT OF
PLAINTIFF TRADER JOE'S *EX*
PARTE MOTION FOR
PERMISSION TO EFFECT
SERVICE OF PROCESS BY
ALTERNATIVE MEANS AND
EXTENSION OF TIME TO SERVE
DEFENDANT T-SHIRT AT
FASHION LLC**

Date: July 24, 2023

Time: 10:00 a.m.

Judge: Hon. Michael W. Fitzgerald

DECLARATION OF TAYLOR LASTOR

I, Taylor Lastor, declare as follows:

1. I am over 18 years of age and make this declaration based upon personal knowledge of facts set forth below except as to those matters stated on information and belief. As to those matters, I am informed and believe them to be true. If called upon to testify, I could and would testify under oath to the matters set forth herein.

2. I am an owner of the business TRE Racing Engines. This declaration is filed in support of Trader Joe's *Ex Parte* Motion for Permission to Effect Service by Alternative Means on Defendant T-Shirt AT Fashion LLC ("Defendant"), filed contemporaneously with this declaration.

3. I operate TRE Racing Engines with my wife, Rhonda Lastor, at the address 909 County Road 2216, Cleveland, Texas 77327.

4. TRE Racing Engines was founded in 1987. We build and service engines used for drag racing, circle track racing, pulling, and street machines. We have operated TRE Racing Engines from our Cleveland, Texas address since 2009.

5. I am informed and believe that Defendant claims to operate its T-shirt business from the same Cleveland, Texas address, and identifies my address on its website, at <<https://t-shirtat.com>> (the "Website").

6. I am not affiliated with Defendant and have never been affiliated with Defendant.

7. In the past several years, many people and businesses have attempted to contact Defendant at my address. For example, at least twenty others have come to my address attempting to serve Defendant with process. I have also received at my address many return orders of products purchased from Defendant via the Website.

8. I am informed and believe that people and businesses continue to attempt to contact Defendant at my address because Defendant advertises my

1 address as its own address on at least the Website.

2 9. I have been unable to make these people and businesses stop
3 attempting to contact Defendant through my address, which has caused my family
4 and me great irritation and distress.

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6 I declare under penalty of perjury under the laws of the United States of
7 America that the foregoing is true and correct, and was executed on July 12, 2023 at
8 Cleveland, Texas.

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10 By: /s/ Taylor Lastor

11 Taylor Lastor
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